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and for Defendants AEROFLEX INCORPORATED,
AMI SEMICONDUCTOR, INC., MATROX
ELECTRONIC SYSTEMS, LTD., MATROX
GRAPHICS, INC., MATROX INTERNATIONAL
CORP., MATROX TECH, INC. and AEROFLEX
COLORADO SPRINGS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,

Plaintiff,

vs.

AEROFLEX INCORPORATED, et al.,

Defendants.

SYNOPSYS, INC.,

Plaintiff,

vs.

RICOH COMPANY, LTD.,

Defendant.

Case No. C03-04669 MJJ (EMC)

Case No. C03-2289 MJJ (EMC)

**ADMINISTRATIVE MOTION FOR
PLACING DOCUMENTS UNDER SEAL
(L.R. 7-11 and 79-5(d))**

Judge: Hon. Martin J. Jenkins

Pursuant to Civil L.R. 7-11, Plaintiff Synopsys, Inc. and Defendants Aeroflex Incorporated, Aeroflex Colorado Springs, Inc., AMI Semiconductor, Inc., Matrox Electronic Systems, Ltd., Matrox Graphics, Inc., Matrox International Corp., and Matrox Tech, Inc. (“the Customer Defendants”) hereby bring this administrative motion for an order to file under seal, and request permission to file under seal the following Exhibits lodged with the Clerk of the Court:

1) Reply Memorandum in Support of Synopsys, Inc.’s and Customer Defendants’ Motion for Summary Judgment of Non-Infringement (RTL) (No. 1).

2) Reply Memorandum in Support of Synopsys, Inc.’s and Customer Defendants’ Motion for Summary Judgment of Non-Infringement (Hardware Cells) (No. 2).

3) Reply Memorandum in Support of Synopsys, Inc.’s and Customer Defendants’ Motion for Summary Judgment of Non-Infringement (Other Elements) (No. 6).

4) Reply Memorandum In Support of Defendants' Motion for Summary Judgment Regarding the Scope of Patent Damages for Alleged Infringement of U.S. Patent No. 4,922,432 (No. 7).

2) Exhibit Nos. 93-95 and 106 to the Supplemental Declaration of Denise M. De Mory In Support of Motions For Summary Judgment.

This request is made pursuant to the Stipulated Protective Order in this action. The above documents include and refer to materials produced in discovery and designated confidential by Synopsys and the Customer Defendants because they contain confidential business information of Synopsys, the Customer Defendants, and third parties. Public dissemination of this information could cause Synopsys, the Customer Defendants, or third parties competitive harm.

Exhibits 93-95 are allegedly confidential as designated by Ricoh Company, Ltd. (“RicoH”). Pursuant to Civil L.R. 79-5(d), Ricoh is to file, within five court days, (i) a declaration establishing that the above information is sealable and (ii) a narrowly tailored proposed sealing order for those exhibits.

The Customer Defendant respectfully requests this Court to grant an order permitting the above documents to be filed under seal.

1 Dated: September 11, 2006

Respectfully submitted,

4 By: /s/Denise M. De Mory

5 Denise M. De Mory
6 Attorneys for Plaintiff SYNOPSISYS and
7 Defendants AEROFLEX INCORPORATED, AMI
8 SEMICONDUCTOR, INC., MATROX
9 ELECTRONIC SYSTEMS, LTD., MATROX
10 GRAPHICS, INC., MATROX INTERNATIONAL
11 CORP., MATROX TECH, INC. and AEROFLEX
12 COLORADO SPRINGS, INC.
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CORP., MATROX TECH, INC. and AEROFLEX
9 COLORADO SPRINGS, INC.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 RICOH COMPANY, LTD.,

15 Plaintiff,

16 vs.

17 AEROFLEX INCORPORATED, et al.,

18 Defendants.

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20 SYNOPSYS, INC.,

21 Plaintiff,

22 vs.

23 RICOH COMPANY, LTD.,

24 Defendant.
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Case No. C03-04669 MJJ (EMC)

Case No. C03-2289 MJJ (EMC)

**[PROPOSED] ORDER GRANTING
ADMINISTRATIVE MOTION FOR
PLACING DOCUMENTS UNDER SEAL
(Civil L.R. 7-11 and 79-5(d))**

Judge: Hon. Martin J. Jenkins

1 Pursuant to Civil L.R. 7-11, plaintiff Synopsys, Inc. and defendants Aeroflex Incorporated,
2 Aeroflex Colorado Springs, Inc., AMI Semiconductor, Inc., Matrox Electronic Systems, Ltd., Matrox
3 Graphics, Inc., Matrox International Corp., and Matrox Tech, Inc. ("the Customer Defendants") on
4 September 8, 2006 have filed an Administrative Motion for a Sealing Order pursuant to Civil Local
5 Rules 7-1 and 79-5(d), and request to file under seal, the following documents:

6 1) Defendants' Reply Memorandum In Support of Defendants' Motion for Summary
7 Judgment Regarding the Scope of Patent Damages for Alleged Infringement of U.S. Patent No.
8 4,922,432.

9 2) Exhibit No. 106 to the Supplemental Declaration of Denise M. De Mory In Support of
10 Motions For Summary Judgment.

11 Because the above documents include and refer to materials produced in discovery and
12 designated confidential by the Customer Defendants or Synopsys this request was made pursuant to the
13 Stipulated Protective Order in this action.

14 The Court hereby GRANTS this request.

15 IT IS SO ORDERED

16 Dated: _____

Hon. Martin J. Jenkins
Judge of the United States District Court